

In rebuttal to Applicant's arguments in the previous response, the Examiner stated that Applicant's claimed EUI is equivalent to Toguchi's physical ID. However, as pointed out in Applicant's previous response, Applicant is using the term EUI with its commonly accepted definition given in the Request for Comment (RFC) 2734 for *IPv4 over IEEE 1394*, December 1999. A 1394 EUI is a 64-bit number that uniquely identifies a node among all the Serial Bus nodes manufactured worldwide. The EUI is a fixed identifier assigned by the manufacturer of the node and remains the same regardless of the bus to which it is attached and does not change across bus re-initializations.

Because Toguchi specifies that his invention operates within a IEEE 1394 bus network, the terms within Toguchi must be interpreted consistently with their commonly accepted meaning in the 1394 bus art unless Toguchi defines the terms differently. Toguchi discloses that the physical ID is a 6-bit number [col. 6, lines 27-28] that is allocated to each node connected to a bus [col. 4, lines 17-19]. The 1394 defines the physical ID as a 6-bit number that is dynamically assigned during the self-identification process for a particular bus and uniquely identifies a node on that particular bus. Thus, the physical ID may change when the node is attached to a different bus and when the self-identification process is re-executed during a bus re-initialization. Because Toguchi does not define the term differently that it is defined in the 1394 RFC, the physical ID cannot be properly interpreted as equivalent to an EUI, which is a fixed 64-bit number. Furthermore, the 1394 RFC specifies that the EUI and the physical ID are different identifiers, and thus teaches away from the Examiner's statement that Applicant's claimed EUI and Toguchi's physical ID are equivalent.

Accordingly, Applicant respectfully submits that the invention claimed in claims 1-20 is not anticipated by Toguchi under 35 U.S.C. § 102(e) and respectfully requests the withdrawal of the rejection of the claims.

SUMMARY

Claims 1-20 are currently pending. In view of the foregoing amendments and remarks, Applicant respectfully submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Sue Holloway at (408) 720-3476.

Deposit Account Authorization

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

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